

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
vs.)	
)	NO. 16 C 799
NANKING ATLANTIC CITY, INC., a New Jersey))	
corporation, d/b/a NANKING ASIAN FUSION))	JUDGE AMY J. ST. EVE
AT BALLY'S ATLANTIC CITY,)	
)	
AMIN HIMANI, an individual,)	
)	
SUNNY CHARNJIV, an individual,)	
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendants, NANKING ATLANTIC CITY, INC., a New Jersey corporation, d/b/a NANKING ASIAN FUSION AT BALLY'S ATLANTIC CITY, AMIN HIMANI, an individual, and SUNNY CHARNJIV, an individual, in the total amount of \$30,833.36, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,196.00.

On February 29, 2016, the Summons and Complaint was served on the Registered Agent for Nanking Atlantic City, Inc., d/b/a Nanking Asian Fusion at Bally's Atlantic City by tendering a copy of said documents to Amin Himani, personally, at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, Nanking Atlantic City, Inc., d/b/a Nanking Asian Fusion at Bally's Atlantic City's answer was due on March 21, 2016. As Defendant,

Nanking Atlantic City, Inc., d/b/a Nanking Asian Fusion at Bally's Atlantic City has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

On February 29, 2016, the Summons and Complaint was served on Defendant, Amin Himani, by tendering a copy of said documents to him personally, at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, Amin Himani's answer was due on March 21, 2016. As Defendant, Amin Himani, has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

On February 20, 2016, the Summons and Complaint was served on Defendant, Sunny Charnjiv, by tendering a copy of said documents to Monica Charnjiv, at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, Sunny Charnjiv's answer was due on March 14, 2016. As Defendant, Sunny Charnjiv has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

Laura M. Finnegan
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 7th day of July 2016:

Nanking Atlantic City, Inc.
c/o Amin Himani, Registered Agent
9 Buckthorn Court
Morganville, NJ 07751

Mr. Amin Himani
9 Buckthorn Court
Morganville, NJ 07751

Mr. Sohi (Sunny) Charnjiv
325 Sussex Road
Egg Harbor Township, NJ 08234

/s/ Laura M. Finnegan

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